



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

F.#2010R00420

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 12, 2012

By Hand Delivery and ECF

The Honorable Frederic Block
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Pedro Espada, Jr. et al.
Criminal Docket No. 10-985 (S-2) (FB)

Dear Judge Block:

The government respectfully requests that the Court ask the jurors the questions set forth in the attached chart tomorrow during jury selection tomorrow.

Additionally, questions 47 and 48 of the questionnaire contained structural errors that made them virtually impossible to answer correctly. The government thus respectfully requests that the Court ask the jurors those questions in a comprehensible manner, inquiring if (a) the jurors could render a guilty verdict if guilt were proved beyond a reasonable doubt, and (b) they possess any religious, philosophical or other beliefs that would make them unable to render a verdict for reasons unrelated to the law and the evidence.

Finally, the government moves to strike jurors number 48, 49, 79 and 84 for cause for the reasons noted in the attached chart.

Respectfully submitted,

LORETTA E. LYNCH
United States Attorney

By: /s/
Carolyn Pokorny
Assistant U.S. Attorney
(718) 254-7000

cc: Defense Counsel (via email)